

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

By:

FEB 20 2024
TAMMY H. DOWNS, CLERK
DEP CLERK

**ROY HOLMES, TINA ALEXANDER,
PATRICK NORRIS and MELISSA GARNER,
Each Individually and on Behalf
of All Others Similarly Situated**

PLAINTIFFS

vs.

No. 4:20-cv-191-DPM

**STETSON COURIER, INC.,
and JOHN STETSON**

DEFENDANTS**J.P. MORGAN CHASE BANK****GARNISHEE**

APPLICATION FOR WRIT OF GARNISHMENT

Plaintiffs (judgment creditors) hereby make application to the Clerk of the United States District Court for the Eastern District of Arkansas, Central Division, for issuance of a Writ of Garnishment to satisfy Judgments against Defendants Stetson Courier, Inc., and John Stetson. In support of this application, the following information is provided:

1. On 29 September 2023, this Court entered a judgment in favor of Plaintiffs against Defendants for \$59,313.08 in damages. See Judgment, ECF No. 138. On 15 December 2023, this Court entered a judgment of \$75,510.01 in attorneys' fees and costs, for a total of \$134,823.09. See also Attorneys' Fees Judgment, ECF No. 147.
2. Defendants have made partial payment in the amount of \$10,500.00.
3. As of 20 February 2024 the Judgments remain partially outstanding, as follows:

Plaintiffs' Judgments (09/29/2023):	\$59,313.08
Post-judgment Interest: (accrued 09/29/2023 through 2/5/2024):	\$1,096.56

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Roy Holmes, et al. v. Stetson Courier, Inc., et al.
U.S.D.C. (E.D. Ark.) Case No. 4:20-cv-191-DPM
Application for Writ of Garnishment

Attorneys' Fees Judgments (12/15/2023):	\$75,510.01
Post-judgment Interest: (accrued 12/15/2023 through 2/5/2024):	\$587.37
Amount paid:	-\$10,500.00
Balance Due:	\$126,007.50

4. Plaintiffs allege that there is reason to believe that J.P. Morgan Chase Bank ("Garnishee") is indebted to one or both Defendants or possesses goods, chattels, moneys, credits, or effects belonging to them.

5. Therefore, Plaintiffs respectfully request the issuance of the Writ of Garnishment attached to this Application.

Respectfully submitted,

**ROY HOLMES, TINA ALEXANDER,
PATRICK NORRIS and MELISSA
GARNER, PLAINTIFFS**

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

**ROY HOLMES, TINA ALEXANDER,
PATRICK NORRIS and MELISSA GARNER,
Each Individually and on Behalf
of All Others Similarly Situated**

PLAINTIFFS

vs.

No. 4:20-cv-191-DPM

**STETSON COURIER, INC.,
and JOHN STETSON**

DEFENDANTS

J.P. MORGAN CHASE BANK

GARNIShee

WRIT OF GARNISHMENT

1. As of 15 December 2023, Roy Holmes, Tina Alexander, Patrick Norris, Melissa Garner, and the Sanford Law Firm were awarded Judgments against Defendants Stetson Courier, and John Stetson, in the total amounts of \$59,313.08 in damages and \$75,510.01 in attorneys' fees and costs, for a total of \$134,823.09. As of 20 February 2024, the amount of \$126,007.50 remains unsatisfied.

2. Garnishee is directed to prepare a written answer, UNDER OATH, and to file this answer in the office of Clerk of the United States District Court, Eastern District of Arkansas, Central Division, within THIRTY (30) days from the date on which it is served with this Writ. The written answer should contain a statement of any and all goods, chattels, moneys, credits, or effects Garnishee may possess belonging to Defendants Stetson Courier, Inc., and John Stetson. Unless Garnishee files such written answer within THIRTY (30) days, judgment may be rendered against it for the stated amount, together with court costs of this action.

3. In addition, Garnishee is required to answer any further interrogatories that may be propounded to it.

4. Garnishee should not pay any money to the Clerk but should hold the money until an order from the Court directs Garnishee to release the money. Garnishee will then pay it to Plaintiff's attorney.

NOTICE TO NON-EMPLOYER GARNISHEE

FAILURE TO ANSWER THIS WRIT WITHIN 30 DAYS OR FAILURE OR REFUSAL TO ANSWER THE INTERROGATORIES ATTACHED HERETO SHALL RESULT IN THE COURT ENTERING A JUDGMENT AGAINST YOU AND YOU BECOMING PERSONALLY LIABLE FOR THE FULL AMOUNT SPECIFIED IN THIS WRIT TOGETHER WITH COSTS OF THIS ACTION AS PROVIDED BY ARKANSAS CODE ANNOTATED § 16-110-407.

**NOTICE TO DEFENDANT OF YOUR RIGHT TO KEEP WAGES,
MONEY, AND OTHER PROPERTY FROM BEING GARNISHED**

The Writ of Garnishment or Writ of Execution delivered to you with this Notice means that wages, money, or other property belonging to you has been garnished in order to pay a court judgment against you. HOWEVER, YOU MAY BE ABLE TO KEEP YOUR MONEY OR PROPERTY FROM BEING TAKEN, SO READ THIS NOTICE CAREFULLY.

State and federal laws say that certain money and property may not be taken to pay certain types of court judgments. Such money or property is said to be 'exempt' from garnishment.

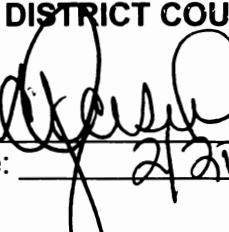
For example, under the Arkansas Constitution and state law, you will be able to claim as exempt all or part of your wages or other personal property. As another example,

under federal law the following are also exempt from garnishment: Social Security, SSI, Veteran's benefits, Temporary Assistance for Needy Families, unemployment compensation, and workers' compensation.

You have a right to ask for a court hearing to claim these or other exemptions. If you need legal assistance to help you try to save your wages or property from being garnished, you should see a lawyer. If you can't afford a private lawyer, contact your local bar association or ask the clerk's office about any legal services program in your area.

TAMMY H. DOWNS

U.S. DISTRICT COURT CLERK

By: 

Date: 2/20, 2024

EXPLANATION

Plaintiffs' Judgments (09/29/2023):	\$59,313.08
Post-judgment Interest: (accrued 09/29/2023 through 2/5/2024):	\$1,096.56
Attorneys' Fees Judgments (12/15/2023):	\$75,510.01
Post-judgment Interest: (accrued 12/15/2023 through 2/5/2024):	\$587.37
Amount paid:	-\$10,500.00
Balance Due:	\$126,007.50

CERTIFICATE OF SERVICE

I, Josh Sanford, do hereby certify that on February 20, 2024, I sent a copy of the foregoing Writ of Garnishment and Notice to Defendants via First Class U.S. Mail to Defendants at their last known residential address and to their attorney listed below:

Stetson Courier, Inc. c/o John Stetson
595 Bay Isles Rd, Suite 210
Longboat, Florida 34228
Defendants

Alexander D. Clark
ROSE LAW FIRM, P.A.
120 East Fourth Street
Little Rock, Arkansas 72201
Telephone: (501) 375-9131
aclark@roselawfirm.com
Attorney for Defendants

/s/ Josh Sanford
Josh Sanford